

Appln. No. 09/994,544  
Amdt. dated Sept. 9, 2005  
Reply to Final Office Action of May 26, 2005  
and Advisory Action of August 12, 2005  
Docket No. DE9-2000-0031 (267)

**REMARKS/ARGUMENTS**

These remarks are made in response to the Final Office Action of May 26, 2005 (Office Action) and the Advisory Action of August 12, 2005. This response is filed after the 3-month shortened statutory period, and as such, a retroactive extension of time is hereby requested. The Examiner is authorized to charge the appropriate extension fee and request for continued examination fee to Deposit Account 50-0951.

As a result of this amendment, claims 1, 8, 13, 18 and 19 have been amended and claims 4, 5, and 15-17 have been cancelled. In paragraphs 1-2, claims 1 and 13 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,515,490 to Buchanan, *et al.* (Buchanan) in view of U.S. Patent No. 5,649,060 to Ellozy, *et al.* (Ellozy). Claims 1 and 13 (as well as claim 8) have been amended to include the limitation of aligning at least one version of content with a first representation to produce a web of relations between a structural view of at least one version of content and the first representation.

Buchanan discusses a method and system for temporally formatting data presentations in time-dependent documents. The main focus of Buchanan is the generation and scheduling of time-dependent multi-media presentations and therefore the structural information in Buchanan is primarily the temporal metadata of the media item.

Appln. No. 09/994,544  
Amdt. dated Sept. 9, 2005  
Reply to Final Office Action of May 26, 2005  
and Advisory Action of August 12, 2005  
Docket No. DE9-2000-0031 (267)

There is no suggestion or motivation in Buchanan to use any kind of semantic structure alignment since Buchanan solely uses temporal formatting data among time-dependent documents. Notwithstanding that Ellozy notes that a summary script and speech data most often do not have time correlation, Ellozy does discuss using time stamps associated with anchor points and therefore does not lack temporal information (as recited in claim 3). Further review of Ellozy shows that Ellozy does indeed use temporal information and uses such temporal information to align text with audio as clearly illustrated in FIG. 3 where a Timer 16 and a Timer Alignment module 42 are used in conjunction with an Automatic Speech recognizer. A time aligner 106 is also shown in FIG. 2. In Col. 5, lines 30 through 63, Ellozy specifically states that the text is time aligned with the audio. Thus, this contradicts such assertions that Ellozy does not use temporal data and teaches away from the claimed invention. Further reference to such time alignment is shown in FIG. 5 as well. If one were to combine the teachings of Buchanan and Ellozy as a whole, it would appear that such teaching would still use temporal information to align one representation with another representation when attempting to synchronize first and second representations.

The prior element of claim 4 (now incorporated in claims 1, 8 and 13) in particular recites aligning at least one version of content (of the realization) with the first representation to produce a web of relations using semantic structure association

Appln. No. 09/994,544  
Amdt. dated Sept. 9, 2005  
Reply to Final Office Action of May 26, 2005  
and Advisory Action of August 12, 2005  
Docket No. DE9-2000-0031 (267)

information. Furthermore, neither Ellozy nor Buchanan discusses aligning at least one version of content with a first representation to produce a web of relations between a structural view of at least one version of content as currently recited in claims 1 and 13. The prior Examiner attempted to use a combination of references in a piecemeal fashion in an attempt to obviate such currently claimed combination of elements. Specifically, regarding paragraph 4 of the Office Action, claims 4-5 and 16-17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan, Ellozy, and Kim, in view of another publication, "Cooperative Use of MHEG-5 and HyTime" by Rutledge, *et al.* (Rutledge). Such combination still fails to obviate the claims of the present invention due to the noted shortcomings in Buchanan and Ellozy noted above and further in the view that Rutledge further fails to suggest, mention or contemplate a web of relations as recited in the claims of the present invention in the context of aligning multiple representations using semantic structural alignment as currently claimed. Rutledge instead discusses complex hyperlinking and appears to fail to suggest, mention or contemplate the steps of aligning a version of content with a first representation to produce a web of relations between a structural view of a version of content with and the first representation. There is only a nebulous discussion of complex hyperlinking and it would appear a piecemeal combination of references to use Buchanan, Ellozy, and Rutledge in an attempt to obviate the claims as currently recited. Where in the Abstract of Rutledge or elsewhere is there a discussion of a web of relations between a structural

Appln. No. 09/994,544  
Amtd. dated Sept. 9, 2005  
Reply to Final Office Action of May 26, 2005  
and Advisory Action of August 12, 2005  
Docket No. DE9-2000-0031 (267)

view of a version of content and a first representation? With respect to the reference by Kim, although there is a discussion of using a "Synchronization Relation Tree", such discussion in Kim is focused on a "Temporal Synchronization." Again, if one were to combine the teachings of Buchanan, Ellozy, Kim, and Rutledge, one would still require the use of temporal information. There is no suggestion or motivation to combine the teachings of Kim or Rutledge using a "Synchronization Relation Tree" with the teachings of Ellozy and Buchanan for the purposes of alignment of semantically structured elements as currently claimed. "Dynamic Schedule Completion" in Kim as referenced by the previous examiner is once more another nebulous term that does not appear to have anything to do with the specific elements related to semantic structure as claimed in the present invention. Such combination of references as a whole would at best still teach temporally aligned representations without use of semantic structure association information as recited in the applicant's claims and without a web of relations between a structural view of at least one version of content and the first representation.

Regarding paragraph 5 of the Office Action, claims 6 and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan, Ellozy, Kim, Rutledge, in view of U.S. Patent No. 5,731,847 to Tsukagoshi, *et al.*, (Tsukagoshi), and to U.S. Patent 5,794,197 to Alleva, *et al.* (Alleva) and finally in view of the publication "Using the Strategy Design Pattern to Compose Reliable Distributed Protocols", by Garbinato, *et al.* (Garinato). Note, the arguments used above further apply to these claims. Once again,

Appln. No. 09/994,544  
Amdt. dated Sept. 9, 2005  
Reply to Final Office Action of May 26, 2005  
and Advisory Action of August 12, 2005  
Docket No. DE9-2000-0031 (267)

such combination fails to obviate the claims of the present invention due to the noted deficiencies in Buchanan, Kim, Rutledge, and Ellozy noted above. Furthermore, Applicants believe that there is no demonstrated suggestion or motivation to combine in order to obviate the claims of the present invention. In any event, even if one were to combine such references, such combination still fails to suggest, mention or contemplate the realization, the first representation, and the second representation using the semantic structure as recited in the amended claims.

Regarding paragraphs 6-10, the Applicants once again reiterate the arguments provided above, particularly in the reliance of the Buchanan, Ellozy and Kim references. Other references in the Office Action by the Examiner have been reviewed, but do not appear to further affect the patentability of the claims of the present invention.

Note, claims 20 and 21 were newly added to further emphasize in one particular embodiment that only semantic structure association information is used in the step of synchronizing a second representation with the first representation and the realization.

In light of the foregoing, withdrawal of the 35 U.S.C. § 103(a) rejections with respect to the claims is respectfully requested. As none of the references either singly, nor in any combination thereof, teaches or suggests the features of the present invention

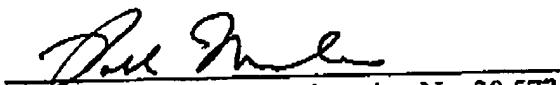
Appn. No. 09/994,544  
Amdt. dated Sept. 9, 2005  
Reply to Final Office Action of May 26, 2005  
and Advisory Action of August 12, 2005  
Docket No. DE9-2000-0031 (267)

as claimed as amended, withdrawal of the rejections regarding the pending claims is once again respectfully requested in view of the amendments herein.

The Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Response, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

Date: Sept. 9, 2005

  
\_\_\_\_\_  
Gregory A. Nelson, Registration No. 30,577  
Pablo Meles, Registration No. 33,739  
AKERMAN SENTERFITT  
Customer No. 40987  
Post Office Box 3188  
West Palm Beach, FL 33402-3188  
Telephone: (561) 653-5000